

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

JEFFERSON-PILOT LIFE INS. CO.,)	:	CASE NO. C-1-02-479
)	
Plaintiff,	:	JUDGE BARRETT
)	Magistrate Judge Hogan
vs.	:	
)	
CHRISTOPHER L. KEARNEY,	:	
)	
Defendant,	:	
)	
vs.	:	OBJECTION TO CONFIDENTIALITY
)	<u>DESIGNATION</u>
DISABILITY MANAGEMENT	:	
SERVICES, INC.,)	
	:	
Third-Party Defendant.)	

Prior to the May 3 and May 4, 2007, depositions of employees of Disability Management Services, Inc., Messrs. Bob Mills and William Hughes, and without knowing what the substance of the examinations would be, counsel for JP/DMS declared that the entirety of the to-be-taken depositions should be treated as “Confidential” pursuant to JP/DMS’ proposed but unsigned Protective Order.

Even if the JP/DMS proposed Protective Order were in place (which it isn’t), JP/DMS’ advance declaration is entirely inappropriate. No testimony in any fashion could be considered as appropriate for “Confidentiality” protection.

Accordingly, Kearney hereby objects to JP/DMS’ request and declaration.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above was filed electronically with the ECF system and was thereby electronically served this 18th day of May 2007, on William R. Ellis, Esq. Wood & Lamping, 600 Vine Street, Suite 2500, Cincinnati, Ohio 45202 and John Meagher, Esq., Shutts & Bowen LLP, 1500 Miami Center, 201 South Biscayne Blvd., Miami, Fl. 33131.

/s Michael A. Roberts